

EVALUATION OF THE COUNCIL OF EUROPE ACTION PLAN FOR UKRAINE "RESILIENCE, RECOVERY AND RECONSTRUCTION" 2023-2026

May 2026



INTRODUCTION

This evaluation assessed the Council of Europe Ukraine Action Plan 2023-2026 'Resilience, Recovery and Reconstruction' - the Organisation's largest-ever single-country action plan, with a budget raised to 65 million euros in recognition of escalating wartime needs. The Action Plan supports Ukraine in advancing European

standards on the rule of law, democracy and human rights while addressing the acute stresses and vulnerabilities caused by Russia's war of aggression. At the time of the evaluation, it covers 54 projects structured across 16 outcome areas under three pillars: human rights, rule of law, and democracy.



WHY THIS EVALUATION? ...

The evaluation, commissioned by the Directorate of Internal Oversight and carried out by an independent external team during the penultimate year of the Action Plan, gathered insights on its strategic value, operational performance, and results. Findings are intended to shape the design of the next Ukraine Action Plan, scheduled for 2027. The assessment encompassed a portfolio-level review as well as targeted explorations across multiple thematic areas, covering projects with a total budget of 22.4 million euros.

WHAT DID THE EVALUATION FIND?



Strategic alignment

The Action Plan demonstrates strong strategic alignment with Ukraine's national priorities and its constitutionally mandated goal of EU accession, reinforced by demand-driven design and the Council of Europe's normative authority. Its flexible design proved critical in maintaining relevance as wartime conditions evolved.



Effectiveness

Significant progress was made in most reform areas, notably by turning European standards into practical tools. Achievements include improved rights for displaced persons and returnees, strengthened child protection, anti-money laundering reforms, measures against cybercrime, and increased youth participation. Wartime responsiveness enhanced strategic relevance, as activities adapted to address displacement, war crimes, minority protection, conflict-related sexual violence, and judicial safeguards under martial law.



Constraints

Progress was more limited in complex structural reform areas - notably justice reform - where outcomes depend on large-scale institutional change and contributions from multiple actors. High institutional turnover, security constraints, and significant funding deficits (a 45% shortfall in 2023, reduced to 17.5% by end 2025) moderated the pace and depth of reform.



Efficiency

The Action Plan has a functioning management and reporting system that helped keep a large portfolio on track under volatile conditions, though funding shortfalls - reaching 45% in the first year - forced delays and cancellations of some activities. Delivery adapted through online modalities and greater use of national expertise, which reduced costs but sometimes affected the quality of support. Monitoring remained focused on activities delivered rather than results achieved, and coordination with development partners, while generally strong, often relied on informal arrangements rather than clear structures.

LESSONS LEARNED AND BEST PRACTICE



- ▶ Structured flexibility is essential in wartime. Adaptability worked best when anticipated and built into project designs - through contingency plans, modular agendas and pre-agreed backup scenarios - rather than relying on ad hoc adjustments.
- ▶ Physical presence matters, even in a digital environment. Online delivery enabled continuity but could not ensure the trust-building and behavioural change essential for sensitive or complex reforms.
- ▶ National expertise is a valuable addition to international expertise, but not a substitute. Maintaining national staff in-country under wartime conditions proved pivotal to successful delivery of the Action Plan.

SUMMARY OF RECOMMENDATIONS



1. **Incorporate risk analysis and adaptive support:** the Action Plan should analyse evolving threats to democracy, rule of law, and human rights, including options for responsive and mitigative support.
2. **Develop operational tools:** project designs should explicitly envisage the development of practical tools and mechanisms for implementing new laws and policies.
3. **Safeguard institutional memory:** support institutions with reform trackers, briefings for new officials, and handover notes.
4. **Integrate theories of change:** project designs should articulate causal links and assumptions between activities and results, using these for annual reflection.
5. **Map complementarity with development partners:** prepare and update maps showing main partners, the Council of Europe's comparative advantage, and opportunities for strategic collaboration.
6. **Develop Adaptive Programming Guidance:** issue guidance for Council of Europe operations in war-affected contexts, covering flexible approaches, decision-making rules, and contingency budgeting.
7. **Strengthen gender mainstreaming:** move from activity-based gender parity metrics to institutional gender analysis across project goals and protocols, aligned with the Organisation's Gender Equality Strategy 2024-2029.



HOW WAS THIS EVALUATION CONDUCTED?

Data collection 2024-2025

Report finalised May 2026



20

projects examined
in depth
8 thematic deep dives



57

key informant interviews
80 respondents
(53% female)



3

evaluation criteria:
relevance, efficiency,
effectiveness

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